A CORBA Gateway between CORBA-based applications and an enterprise manager may be configurable to manage various networked objects, such as printers, scanners, copiers, telephone systems, etc., which may be interconnected via networks. CORBA-based manager applications may communicate managed object-related messages, such as events, requests, and responses, with the managed objects through a CORBA Object Request Broker (ORB). The CORBA gateway may translate the manager requests from IDL to PMI requests. Similarly, the CORBA gateway may translate the enterprise manager PMI responses and PMI events to IDL/IIOP responses and events which may be passed on through the CORBA ORB to the manager applications in the form of IDL responses and CORBA events. In some embodiments, the client may choose the format in which to send and receive message information. To provide text based events, requests, and replies, an extension IDL interface may be used.

REMARKS

Applicants are in receipt of the Office Action mailed May 7, 2003. Claims 1-45 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejections:

The Office Action rejected claims 1-3, 5, 6, 16-18, 20, 21, 31-33, 35 and 36 under 35 U.S.C. § 102(e) as being anticipated by Carre (U.S. Patent 6,282,579). Applicants respectfully traverse this rejection.

The Examiner states that Carre teaches a network management system comprising a gateway which is coupled to one or more managed objects and which is configured to deliver messages between the managed objects and one or more managers; a platform-independent interface to the gateway, wherein the gateway is configurable to communicate with the managers through the platform-independent interface to deliver the

messages, and wherein the gateway is configurable to deliver the messages for each manager in a format selected by that manager.

Applicants read Carre to disclose a method for supporting address interaction between a first entity and a second entity which use different addressing modes with address types in different specification languages and with address values of different semantics. (col. 1, lines 62 – 66). Specifically, Carre describes a system for the interactions of CORBA entities and OSI entities via a CORBA infrastructure, wherein each entity interacts via a different specification language. (col. 4, line 63 – col. 5, line 1). Applicant can find no language in Carre that teaches or suggests a system "wherein the gateway is configurable to deliver the messages for each manager in a format selected by that manager," as recited in Applicant's claim 1, as there is no indication in Carre that the CORBA or OSI entities in question are operable to select the format they communicate via. None of the portions of Carre cited by the Examiner teach a manager that can select the message format for messages delivered through a platform-independent interface and gateway to one or managed objects, as recited in claim 1. Thus, claim 1 patentably distinguishes over the cited reference.

Furthermore, Applicants can find no language within Carre that teaches or suggests a system "wherein **the selected format comprises text**," as recited in Applicants' claim 2. The Examiner cites col. 1, lines 30-33. However, this portion of Carre makes absolutely no mention of the limitation of claim 2. Thus, claim 2 is additionally distinguishable over the cited reference.

Claims 1, 2, 4-11, 13-17, 19-26, 28-32, 34-41 and 43-45 were rejected under 35 U.S.C. § 102(e) as being anticipated by Shank et al. (U.S. Patent 6,445,776) (hereinafter "Shank"). Applicants respectfully traverse this rejection.

The Examiner states that Shank teaches a network management system comprising a gateway which is coupled to one or more managed objects and which is configured to deliver messages between the managed objects and one or more managers;

a platform-independent interface to the gateway, wherein the gateway is configurable to communicate with the managers through the platform-independent interface to deliver the messages, and wherein the gateway is configurable to deliver the messages for each manager in a format selected by that manager.

Applicants read Shank to disclose a method which provides access from a client to a recourse coupled to a server by transmitting from the client to the server an object-oriented, language-independent request to establish a session between the client and the server. (col. 1 line 65 – col. 2, line 2). Applicants can find no language in Shank that teaches or suggests a system "wherein the gateway is configurable to deliver the messages for each manager in a format selected by that manager," as recited in Applicants' claim 1, as there is no indication in Shank that the "managers" as identified by the Examiner (210 – 216 of Fig. 2) are operable to select the format they communicate via. In accordance, claim 1 is patentably distinguishable over the cited reference.

Applicants further disagree with the Examiner's characterization of Shank's facsimile service interface 228 in Fig. 2 as a system "wherein **the selected format comprises text**," as recited in Applicant's claim 2. Applicants respectfully submit that 228 is an *interface* to a facsimile service, and that facsimile is not a text format. Thus, claim 2 is further distinguishable over Shank.

Applicants remind the Examiner that for a rejection under section 102, the identical invention must be shown in as complete detail as is contained in the claims. Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim. Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 221 USPQ 481, 485 (Fed. Cir. 1984).

For at least these reasons, claim 1, along with its dependent claims 2-15, are patentably distinct over the cited references.

Claims 16 and 31 recite features similar to claim 1. As such, claims 16 and 31, along with their dependent claims 17-30 and 32-45 are also patentably distinct over the cited references for at least the same reasons.

Various ones of the dependent claims include limitations not taught by Carre or Shank; however, a detailed discussion of these claims is not necessary at this time since the independent claims have been shown to distinguish over the cited art.

Section 103(a) Rejection:

The Office Action rejected claims 3, 12, 18, 27, 33 and 42 under 35 U.S.C. § 103(a) as being unpatentable over Shank. These claims are patentable over Shank for at least the reasons given above in regard to their respective independent claims.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above referenced application from becoming abandoned, Applicants hereby petition for such extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5500-61100/RCK.

Also enclosed herewith are the following items:

Return Receipt Postcard

Petition for Extension of Time

Request for Approval of Drawing Changes

Marked-up Copy of Amended Claims

Marked-up Copy of Amended Abstract		
Fee Authorization Form authorizing a deposit account debit in the amount of \$		
for fees ().	
		Respectfully submitted, Robert C. Kowert Reg. No. 39,255 ATTORNEY FOR APPLICANT(S)
Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. P.O. Box 398 Austin, TX 78767-0398 Phone: (512) 853-8850		

Date: July 1, 2003

MARKED-UP COPY OF ABSTRACT

A CORBA Gateway between CORBA-based applications and an enterprise manager may be configurable to manage various networked objects, such as printers, scanners, copiers, telephone systems[, cell phones, cell phone towers, phone systems, faxes, routers, switches,] etc., which may be interconnected via networks. CORBAbased manager applications may communicate managed object-related messages, such as events, requests, and responses, with the managed objects through a CORBA Object Request Broker (ORB). The CORBA gateway may translate the manager requests from IDL to PMI requests. Similarly, the CORBA gateway may translate the enterprise manager PMI responses and PMI events to IDL/IIOP responses and events which may be passed on through the CORBA ORB to the manager applications in the form of IDL responses and CORBA events. [The use of IDL/CORBA as the interface between manager applications and managed objects provides a platform-independent approach to managing the object-related messages, however, the JIDM standard does not explicitly mandate the IDL format of these messages.] In some embodiments, the client may choose the format in which to send and receive message information. To provide text based events, requests, and replies, an extension IDL interface may be used. [For example, a new IDL interface may be provided which extends the standard JIDM specifications allowing clients to send and receive messages using values in text form rather than in CORBA::Any, which may greatly reduce the network traffic related to managed object events, requests, and responses.]